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Attorneys for Defendant GEM SA

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

BARTECH SYSTEMS INTERNATIONAL  
INC.,

Plaintiff,

V

MOBILE SIMPLE SOLUTIONS, INC., a  
Delaware corporation, MOBILE SIMPLE  
SOLUTIONS (IAS), INC., a Canadian  
corporation, GEM SA, a Belgian  
corporation, VINCENT TESSIER, an  
individual, CHRISTELLE PIGEAT, an  
individual,

Defendants

MOBILE SIMPLE SOLUTIONS, INC., a  
Delaware corporation, VINCENT  
TESSIER, an individual, CHRISTELLE  
PIGEAT, an individual,

Counterclaimants,

vs.

BARTECH SYSTEMS INTERNATIONAL  
INC., a Delaware corporation,

Counter-defendant.

Case No. 2:15-cv-02422-MMD-NJK

**STIPULATION AND ORDER FOR  
CONTINUANCE OF HEARING ON  
DEFENDANT GEM SA'S  
EMERGENCY MOTION TO  
LIFT/DISSOLVE AND/OR  
RECONSIDER THE PRELIMINARY  
INJUNCTION  
(First Request)**

1 Pursuant to the provisions of Federal Rule of Civil Procedure 6 and Local Rules IA 6-1,  
2 Plaintiff and Counter-defendant Bartech Systems International, Inc. (“Bartech”) and Defendant and  
3 Counterclaimant GEM SA (“GEM”), by and through their attorneys, hereby stipulate and agree to a  
4 continuance of the hearing on GEM’s Emergency Motion to Lift/Dissolve and/or Reconsider the  
5 Preliminary Injunction (“Motion to Lift”) currently scheduled for April 19, 2018 at 1:30 p.m.  
6 (“Hearing”). This is the first request for a continuation of the Hearing. GEM and Bartech hereby  
7 stipulate and agree to the following:

8 WHEREAS, this Court set a Hearing on the Motion to Lift for April 19, 2018;

9 WHEREAS, Defendant GEM’s counsel represents that unexpected issues arose on April  
10 17, 2018, at a trial on an unrelated matter in which Defendant GEM’s counsel is involved,  
11 thereby rendering GEM’s counsel unable to attend the Hearing;

12 WHEREAS, GEM and Bartech jointly agree to a continuation of the Hearing;

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1 DATED this 18th day of April, 2018.

2 **GREENE INFUSO, LLP**

3  
4 /s/ Keith W. Barlow  
5 Michael V. Infuso, Esq.  
6 Nevada Bar No. 7388  
7 Keith W. Barlow, Esq.  
8 Nevada Bar No. 12689  
9 3030 South Jones Boulevard, Suite 101  
10 Las Vegas, Nevada 89146

11 Attorneys for Defendant/Counterclaimant

DATED this 18th day of April, 2018.

**PARSONS BEHLE & LATIMER**

/s/ Michael R. Kealy  
*(Signed by filing attorney with permission of*  
*counsel)*  
Michael R. Kealy, Esq.  
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– and –

**CONTI FENN & LAWRENCE LLC**

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*(Admitted Pro Hac Vice)*  
Kyle S. Kushner, Esq.  
*(Admitted Pro Hac Vice)*  
36 S. Charles Street, Suite 2501  
Baltimore, Maryland 21201

Attorneys for Plaintiff/Counterdefendant

12 The hearing set for April 19, 2018 at 1:30 PM is vacated. The matter will be  
13 reset by the Courtroom Administrator.

14 IT IS SO ORDERED:

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UNITED STATES DISTRICT JUDGE

DATED: April 18, 2018